

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**CANDACE BROOKS,**

**Plaintiff,**

**v.**

**PHH MORTGAGE CORPORATION,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No. 4:24-cv-01347**

---

**JOINT NOTICE OF SETTLEMENT**

---

Plaintiff Candace Brooks (“Plaintiff”) and Defendant PHH Mortgage Corporation (“Defendant”) hereby file this Joint Notice of Settlement and respectfully show the Court as follows:

The Parties have reached a tentative settlement regarding the claims and causes of action asserted in the above-reference-and-numbered cause. The Parties fully expect to present dismissal papers to the Court within thirty (30) days.

The Parties respectfully request that the Court stay any pretrial deadlines and remove the above-captioned-and-numbered lawsuit from the Court’s November 19, 2024, Docket Call setting.<sup>1</sup>

Respectfully submitted,

/s/ Taneska L. Jones

**Robert T. Mowrey – Attorney-in-Charge**

Texas Bar No. 14607500

S.D. Texas Bar No. 9529

rmowrey@lockelord.com

**Matthew K. Hansen**

Texas Bar No. 24065368

---

<sup>1</sup> Doc. No. 4.

S.D. Texas Bar No. 1046257  
mkhansen@lockelord.com  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, Texas 75201  
Telephone: (214) 740-8000  
Facsimile: (214) 740-8800

**Taneska L. Jones**  
Texas Bar No. 24106151  
S.D. Texas Bar No. 3171208  
taneska.jones@lockelord.com  
LOCKE LORD LLP  
600 Travis Street, Suite 2800  
Houston, Texas 77002  
Telephone: (713) 226-1563  
Facsimile: (713) 229-2563

**COUNSEL FOR DEFENDANT**

-AND-

/s/ James Q. Pope  
James Q. Pope  
State Bar No. 24048738  
The Pope Law Firm  
6161 Savoy Drive, Suite 1125  
Houston, Texas 77036  
Telephone: (713) 449-4481  
jamesp@thepopelawfirm.com

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of October 2024, a true and correct copy of the foregoing instrument was served on the following counsel of record *via ECF and/or email according to the Federal Rules of Civil Procedure*:

James Q. Pope  
The Pope Law Firm  
6161 Savoy Drive, Suite 1125  
Houston, Texas 77036  
Telephone: (713) 449-4481  
jamesp@thepopelawfirm.com

*Counsel for Plaintiff*

/s/ Taneska L. Jones

Counsel for Defendant PHH